

Judge Robert S. Lasnik

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

NO. CR21-195 RSL

Plaintiff,

AMENDED DISCOVERY PROTECTIVE
ORDER

MIN WOO SHIN,

Defendant.

This matter, having come to the Court's attention on the Stipulation for Entry of a Discovery Protective Order submitted by and through Cecelia Y. Gregson, Assistant United States Attorney for said District and Assistant Federal Public Defenders Jennifer Wellman and Mohammad Hamoudi, Defense Counsel for Defendant Min Woo Shin, and the Court, having considered the motion, and being fully advised in this matter, hereby enters the following PROTECTIVE ORDER:

1. Protected Material

The following documents and materials are deemed Protected Material. The United States will make available copies of the Protected Materials, including those filed under seal, to defense counsel to comply with the government's discovery obligations. Possession of copies of the Protected Materials is limited to the attorneys of record, and

AMENDED DISCOVERY PROTECTIVE ORDER - 1
United States v. Shin CR21-195 RSL

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WA 98101
(206) 553-7970

1 investigators, paralegals, law clerks, experts, and assistants for the attorneys of record
2 (hereinafter collectively referred to as members of the defense team). This category of
3 Protected Materials will be marked and labeled as “Protected Material”:

4 a. All personal identifying information related to the defendant
5 contained in his A File.

6 2. Scope of Review of Protected Material

7 The Government agrees that it would provide the defense with an unredacted
8 version that identifies the information above. The parties agree that the defense team may
9 provide the redacted version to the defendant, and may review the unredacted version
10 with the defendant in the presence of a defense team member or controlled environment
11 so long as the Defendant is not permitted to retain any copies of that unredacted material.
12 The defense agrees that will not provide a paper copy of the unredacted version to the
13 defendant.

14 3. Parties' Reciprocal Discovery Obligations

15 Nothing in this order should be construed as imposing any discovery obligations
16 on the government or the defendant that are different from those imposed by case law and
17 Rule 16 of the Federal Rules of Criminal Procedure, and the Local Criminal Rules.

18 4. Filing of Protected Material

19 Any Protected Material that is filed with the Court in connection with pre-trial
20 motions, trial, sentencing, or other matter before this Court, shall be filed under seal and
21 shall remain sealed until otherwise ordered by this Court. This does not entitle either
22 party to seal their filings as a matter of course. The parties are required to comply in all
23 respects to the relevant local and federal rules of criminal procedure pertaining to the
24 sealing of court documents.

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1 5. Non-termination

2 The provisions of this Order shall not terminate at the conclusion of this
3 prosecution.

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5 DATED this 28th day of December, 2021.

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11 Presented by:

12 /s/ Cecelia Gregson

13 CECELIA GREGSON

14 Assistant United States Attorney

15 /s/ Mohammad Hamoudi

16 MOHAMMAD HAMOUDI

17 Assistant Federal Public Defender

18 *Per email authorization*

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